

Exhibit A

COPY

4-20-17
12201

SUM-100

SUMMONS BY FAX
(CITACION JUDICIAL)NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

GC SERVICES LIMITED PARTNERSHIP; DOES 1-10 inclusive,

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

CAREN SIEGEL,

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)ENDORSED
FILED

APR 11 2017

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SONOMA**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service, if you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.legalhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. (AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.)

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una corte o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida el secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte lo podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.legalhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Superior Court, County of Sonoma

600 Administration Drive
Santa Rosa, CA 95403

CASE NUMBER:
(Número del Caso):

MCV-240960

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Todd M. Friedman, 21550 Oxnard St., Suite 780 Woodland Hills, CA 91367, 877-206-4741

DATE:
(Fecha)

APR 11 2017

JOSE O. GUILLEN

Clerk, by
(Secretario)

Lupe Beas

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de este citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): GC SERVICES LIMITED PARTNERSHIP

- under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☒ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other: (specify):

4. ☐ by personal delivery on (date):

COPY

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Todd M. Friedman, Esq. SBN 216752 Law Offices of Todd M. Friedman 21550 Oxnard St., Suite 780 Woodland Hills, CA 91367 TELEPHONE NO.: 877-206-4741 FAX NO.: 866-633-0228 ATTORNEY FOR (Name): Plaintiff, CAREN SIEGEL		FOR COURT USE ONLY ENDORSED FILED APR 11 2017 SUPERIOR COURT OF CALIFORNIA COUNTY OF SONOMA
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sonoma STREET ADDRESS: 600 Administration Drive MAILING ADDRESS: 600 Administration Drive CITY AND ZIP CODE: Santa Rosa 95403 BRANCH NAME: Hall of Justice		
CASE NAME: CAREN SIEGEL v. GC SERVICES LIMITED PARTNERSHIP		
CIVIL CASE COVER SHEET <input type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000)	<input checked="" type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
		CASE NUMBER: MCV 240960
		JUDGE: ALLAN D. HARDCASTLE DEPT: 419

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:
- | | | |
|---|--|--|
| <input type="checkbox"/> Auto Tort
<input type="checkbox"/> Auto (22)
<input type="checkbox"/> Uninsured motorist (46)
<input type="checkbox"/> Other PIPD/W (Personal Injury/Property Damage/Wrongful Death) Tort
<input type="checkbox"/> Asbestos (04)
<input type="checkbox"/> Product liability (24)
<input type="checkbox"/> Medical malpractice (45)
<input type="checkbox"/> Other PIPD/W (23)
<input type="checkbox"/> Non-PIP/W (Other) Tort
<input type="checkbox"/> Business tort/unfair business practice (07)
<input type="checkbox"/> Civil rights (08)
<input type="checkbox"/> Defamation (13)
<input type="checkbox"/> Fraud (16)
<input type="checkbox"/> Intellectual property (19)
<input type="checkbox"/> Professional negligence (25)
<input checked="" type="checkbox"/> Other non-PIP/W tort (35)
<input type="checkbox"/> Employment
<input type="checkbox"/> Wrongful termination (36)
<input type="checkbox"/> Other employment (15) | <input type="checkbox"/> Contract
<input type="checkbox"/> Breach of contract/warranty (06)
<input type="checkbox"/> Rule 3.740 collections (09)
<input type="checkbox"/> Other collections (09)
<input type="checkbox"/> Insurance coverage (16)
<input type="checkbox"/> Other contract (37)
<input type="checkbox"/> Real Property
<input type="checkbox"/> Eminent domain/inverse condemnation (14)
<input type="checkbox"/> Wrongful eviction (33)
<input type="checkbox"/> Other real property (26)
<input type="checkbox"/> Unlawful Detainer
<input type="checkbox"/> Commercial (31)
<input type="checkbox"/> Residential (32)
<input type="checkbox"/> Drugs (38)
<input type="checkbox"/> Judicial Review
<input type="checkbox"/> Asset forfeiture (05)
<input type="checkbox"/> Petition re: arbitration award (11)
<input type="checkbox"/> Writ of mandate (02)
<input type="checkbox"/> Other judicial review (39) | <input type="checkbox"/> Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)
<input type="checkbox"/> Antitrust/Trade regulation (03)
<input type="checkbox"/> Construction defect (10)
<input type="checkbox"/> Mass tort (40)
<input type="checkbox"/> Securities litigation (28)
<input type="checkbox"/> Environmental/Toxic tort (30)
<input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
<input type="checkbox"/> Enforcement of Judgment
<input type="checkbox"/> Enforcement of judgment (20)
<input type="checkbox"/> Miscellaneous Civil Complaint
<input type="checkbox"/> RICO (27)
<input type="checkbox"/> Other complaint (not specified above) (42)
<input type="checkbox"/> Miscellaneous Civil Petition
<input type="checkbox"/> Partnership and corporate governance (21)
<input type="checkbox"/> Other petition (not specified above) (43) |
|---|--|--|
2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): 2
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 10, 2017

Todd M. Friedman

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed in sanctions).
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Form Adopted for Mandatory Use
Judicial Council of California
CM-010 (Rev. July 1, 2007)**CIVIL CASE COVER SHEET**Page 1 of 2
Cal. Rules of Court, rules 2.30, 3.720, 3.400-3.403, 3.740,
Cal. Standards of Judicial Administration, etc. 3.10
www.courtinfo.ca.govAmerican LegalNet, Inc.
www.Forms1to9.com

BY FAX

CM-010

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort	Contract	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400-3.403)
Auto (22)—Personal Injury/Property Damage/Wrongful Death	Breach of Contract/Warranty (06)	Antitrust/Trade Regulation (03)
Uninsured Motorist (48) <i>(If the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)</i>	Breach of Rental/Lease Contract <i>(not unlawful detainer or wrongful eviction)</i>	Construction Defect (10)
	Contract/Warranty Breach—Seller Plaintiff <i>(not fraud or negligence)</i>	Claims Involving Mass Tort (40)
	Negligent Breach of Contract/Warranty	Securities Litigation (28)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort	Other Breach of Contract/Warranty Collections (e.g., money owed, open book accounts) (08)	Environmental/Toxic Tort (30)
Asbestos (04)	Collection Case—Seller Plaintiff	Insurance Coverage Claims <i>(arising from provisionally complex case type listed above)</i> (41)
Asbestos Property Damage	Other Promissory Note/Collections Case	Enforcement of Judgment
Asbestos Personal Injury/Wrongful Death	Insurance Coverage <i>(not provisionally complex)</i> (18)	Enforcement of Judgment (20)
Product Liability <i>(not asbestos or toxic/environmental)</i> (24)	Auto Subrogation	Abstract of Judgment (Out of County)
Medical Malpractice (45)	Other Coverage	Confession of Judgment <i>(non-domestic relations)</i>
Medical Malpractice—Physicians & Surgeons	Other Contract (37)	Sister State Judgment
Other Professional Health Care Malpractice	Contractual Fraud	Administrative Agency Award <i>(not unpaid taxes)</i>
Other PI/PD/WD (23)	Other Contract Dispute	Petition/Certification of Entry of Judgment on Unpaid Taxes
Premises Liability (e.g., slip and fall)	Real Property	Other Enforcement of Judgment Case
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)	Eminent Domain/Inverse Condemnation (14)	Miscellaneous Civil Complaint
Intentional Infliction of Emotional Distress	Wrongful Eviction (33)	RICO (27)
Negligent Infliction of Emotional Distress	Other Real Property (e.g., quiet title) (26)	Other Complaint <i>(not specified above)</i> (42)
Other PI/PD/WD	Writ of Possession of Real Property	Declaratory Relief Only
Non-PI/PD/WD (Other) Tort	Mortgage Foreclosure	Injunctive Relief Only <i>(non-harassment)</i>
Business Tort/Unfair Business Practice (07)	Quiet Title	Mechanics Lien
Civil Rights (e.g., discrimination, false arrest) <i>(not civil harassment)</i> (08)	Other Real Property <i>(not eminent domain, landlord/tenant, or foreclosure)</i>	Other Commercial Complaint Case <i>(non-tort/non-complex)</i>
Defamation (e.g., slander, libel) (13)	Unlawful Detainer	Other Civil Complaint <i>(non-tort/non-complex)</i>
Fraud (16)	Commercial (31)	Miscellaneous Civil Petition
Intellectual Property (19)	Residential (32)	Partnership and Corporate Governance (21)
Professional Negligence (25)	Drugs (38) <i>(if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)</i>	Other Petition <i>(not specified above)</i> (43)
Legal Malpractice	Judicial Review	Civil Harassment
Other Professional Malpractice <i>(not medical or legal)</i>	Asset Forfeiture (05)	Workplace Violence
Other Non-PI/PD/WD Tort (35)	Petition Re: Arbitration Award (11)	Elder/Dependent Adult Abuse
Employment	Writ of Mandate (02)	Election Contest
Wrongful Termination (36)	Writ—Administrative Mandamus	Petition for Name Change
Other Employment (15)	Writ—Mandamus on Limited Court Case Matter	Petition for Relief From Late Claim
	Writ—Other Limited Court Case Review	Other Civil Petition
	Other Judicial Review (39)	
	Review of Health Officer Order	
	Notice of Appeal—Labor Commissioner Appeals	

COPY

1 Todd M. Friedman (216752)
 2 Adrian R. Bacon (280332)
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 5 Woodland Hills, CA 91367
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 8 tfriedman@toddlaw.com
 9 abacon@toddlaw.com
 10 Attorneys for Plaintiff

ENDORSED
 FILED

APR 11 2017

SUPERIOR COURT OF CALIFORNIA
 COUNTY OF SONOMA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SONOMA
 LIMITED JURISDICTION

10 CAREN SIEGEL,

11 Plaintiff,

12 vs.

13 GC SERVICES LIMITED
 14 PARTNERSHIP; DOES 1-10 inclusive,

15 Defendant.

16) Case No. *mcv 240960*

17) COMPLAINT

18) (Amount not to exceed \$10,000)

- 19) 1. Violation of Rosenthal Fair Debt
 20) Collection Practices Act; and
 21) 2. Violation of Federal Fair Debt
 22) Collection Practices Act

23) JURY REQUESTED

24 I. INTRODUCTION

25 1. This is an action for damages brought by an individual consumer for Defendant's
 26 violations of the Rosenthal Fair Debt Collection Practices Act, Cal. Civ. Code §1788, *et seq.*
 27 (hereinafter "RFDCPA") and the Federal Fair Debt Collection Practices Act, 15 U.S.C. §1692,
 28 *et seq.* (hereinafter "FDCPA"), both of which prohibit debt collectors from engaging in abusive,
 deceptive, and unfair practices.

II. PARTIES

25 2. Plaintiff, CAREN SIEGEL ("Plaintiff"), is a natural person residing in Sonoma
 26 County in the state of California, and is a "debtor" as defined by the RFDCPA, Cal. Civ. Code
 27 §1788.2(h) and a "consumer" as defined by the FDCPA, 15 U.S.C. §1692a(3).

BY FAX

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 Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SONOMA
 LIMITED JURISDICTION

CAREN SIEGEL,) Case No.
Plaintiff,) COMPLAINT
vs.) (Amount not to exceed \$10,000)
GC SERVICES LIMITED) 1. Violation of Rosenthal Fair Debt
PARTNERSHIP; DOES 1-10 inclusive,) Collection Practices Act; and
Defendant.) 2. Violation of Federal Fair Debt
) Collection Practices Act
) JURY REQUESTED

I. INTRODUCTION

1. This is an action for damages brought by an individual consumer for Defendant's violations of the Rosenthal Fair Debt Collection Practices Act, Cal. Civ. Code §1788, *et seq.* (hereinafter "RFDCPA") and the Federal Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* (hereinafter "FDCPA"), both of which prohibit debt collectors from engaging in abusive, deceptive, and unfair practices.

II. PARTIES

2. Plaintiff, CAREN SIEGEL ("Plaintiff"), is a natural person residing in Sonoma County in the state of California, and is a "debtor" as defined by the RFDCPA, Cal. Civ. Code §1788.2(h) and a "consumer" as defined by the FDCPA, 15 U.S.C. §1692a(3).

1 3. At all relevant times herein, Defendant GC SERVICES LIMITED
2 PARTNERSHIP ("Defendant"), was a company engaged, by use of the mails and telephone, in
3 the business of collecting a debt from Plaintiff which qualifies as a "consumer debt," as defined
4 by the RFDCPA, Cal. Civ. Code §1788.2(f), and "debt," as defined by the FDCPA, 15 U.S.C.
5 §1692a(5). Defendant regularly attempts to collect debts alleged to be due another, and therefore
6 is a "debt collector" as defined by the RFDCPA, Cal. Civ. Code §1788.2(c) and the FDCPA, 15
7 U.S.C. §1692a(6).

8 4. The above named Defendant, and its subsidiaries and agents, are collectively
9 referred to as "Defendants." The true names and capacities of the Defendants sued herein as
10 DOE DEFENDANTS 1 through 10, inclusive, are currently unknown to Plaintiff, who therefore
11 sues such Defendants by fictitious names. Each of the Defendants designated herein as a DOE
12 is legally responsible for the unlawful acts alleged herein. Plaintiff will seek leave of Court to
13 amend the Complaint to reflect the true names and capacities of the DOE Defendants when such
14 identities become known.

15 5. Plaintiff is informed and believes that at all relevant times, each and every
16 Defendant was acting as an agent and/or employee of each of the other Defendants and was acting
17 within the course and scope of said agency and/or employment with the full knowledge and
18 consent of each of the other Defendants. Plaintiff is informed and believes that each of the acts
19 and/or omissions complained of herein was made known to, and ratified by, each of the other
20 Defendants.

21 III. FACTUAL ALLEGATIONS

22 6. At various and multiple times prior to the filing of the instant complaint, including
23 within the one year preceding the filing of this complaint, Defendant contacted Plaintiff in an
24 attempt to collect an alleged outstanding debt.

25 7. In or around August of 2016, Plaintiff received a letter in connection with
26 collection on an alleged debt that instructed Plaintiff to call a phone number listed in the letter.
27 Upon calling the phone number, Plaintiff was connected to Defendant, and Defendant had a
28 conversation with Plaintiff in connection with collection on an alleged debt.

1 8. In the aforementioned conversation (hereinafter, "the conversation"), Defendant
2 represented to Plaintiff that she owed Defendant a debt in the amount of approximately \$40,000.
3 Furthermore, Defendant represented that part of or additional to this amount, Plaintiff owed
4 Defendant \$8,000 in fees.

5 9. However, the original loan for which Plaintiff is allegedly responsible is actually
6 only for \$20,000. Furthermore, Plaintiff consistently and timely payed on the original \$20,000
7 loan for three years. Naturally, the loan should be substantially lower than the \$20,000 principle.

8 10. Defendant represented to Plaintiff that Defendant had possessed the loan for a
9 year prior to communicating with Plaintiff, and since possessing the loan, Defendant had begun
10 charging Plaintiff fees and interest.

11 11. Plaintiff never agreed to the fees and interest that Defendant attempted to collect,
12 nor is this amount authorized by law.

13 12. However, Defendant falsely represented to Plaintiff that such fees or interest were
14 due to them.

15 13. All of Defendant's conduct described herein was in connection with collection on
16 an alleged debt.

17 14. Plaintiff sent letters to Defendant as early as May of 2016 with copies of his credit
18 report showing the derogatory mark reported by Defendant and a credit card statement showing
19 that the debt was paid on or around the date of services rendered by WDS.

20 15. Despite this, Defendant continued to report the derogatory mark on Plaintiff's
21 credit report.

22 16. As a result of Defendant's actions, Plaintiff have retained counsel. Plaintiff's
23 counsel sent a notice of representation on or about September 29, 2016. Defendant has failed to
24 respond favorably, if at all, to this day.

25 17. §1788.17 of the RFDCPA mandates that every debt collector collecting or
26 attempting to collect a consumer debt shall comply with the provisions of Sections 1692b to
27 1692j, inclusive, of, and shall be subject to the remedies in Section 1692k of, Title 15 of the
28

1 United States Code statutory regulations contained within the FDCPA, 15 U.S.C. §1692d, and
 2 §1692d(5).

3 18. Defendant's conduct violated the RFDCPA and FDCPA in multiple ways,
 4 including but not limited to:

- 5 a) Falsely representing the character, amount, or legal status of Plaintiff's debt (15
 6 U.S.C. § 1692e(2)(A));
- 7 b) Threatening to take an action against Plaintiff that cannot be legally taken or
 8 that was not actually intended to be taken (15 U.S.C. § 1692e(5));
- 9 c) Using false representations and deceptive practices in connection with
 10 collection of an alleged debt from Plaintiff (15 U.S.C. § 1692e(10));
- 11 d) Using unfair or unconscionable means against Plaintiff in connection with an
 12 attempt to collect a debt (15 U.S.C. § 1692f);
- 13 e) Collecting an amount from Plaintiff that is not expressly authorized by the
 14 agreement creating the debt (15 U.S.C. § 1692f(1)); and
- 15 f) Collecting an amount from Plaintiff that is not permitted by law (15 U.S.C. §
 16 1692f(1)).

17 19. As a result of the above violations of the RFDCPA and FDCPA, Plaintiff suffered
 18 and continues to suffer injury to Plaintiff's feelings, personal humiliation, embarrassment, mental
 19 anguish and emotional distress, and Defendant is liable to Plaintiff for Plaintiff's actual damages,
 20 statutory damages, and costs and attorney's fees.

21 **COUNT I: VIOLATION OF ROSENTHAL**
 22 **FAIR DEBT COLLECTION PRACTICES ACT**

23 20. Plaintiff reincorporates by reference all of the preceding paragraphs.

24 21. To the extent that Defendant's actions, counted above, violated the RFDCPA,
 25 those actions were done knowingly and willfully

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff respectfully prays that judgment be entered against Defendant
 28 for the following:

- A. Actual damages;
- B. Statutory damages for willful and negligent violations;

- C. Costs and reasonable attorney's fees; and
- D. For such other and further relief as may be just and proper.

**COUNT II: VIOLATION OF
FAIR DEBT COLLECTION PRACTICES ACT**

- 22. Plaintiff reincorporates by reference all of the preceding paragraphs.
- 23. To the extent that Defendant's actions, counted above, violated the FDCPA, those actions were done knowingly and willfully.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that judgment be entered against Defendant for the following:

- A. Actual damages;
- B. Statutory damages for willful and negligent violations;
- C. Costs and reasonable attorney's fees; and
- D. For such other and further relief as may be just and proper.

PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY

- 24. Plaintiff reserves her right under Article 1, Section 16 of the Constitution of State of California, to a trial by jury on all issues so triable and hereby demands as much.

Respectfully submitted this 10th day of April, 2017.

By: _____

Todd M. Friedman, Esq.
Law Offices of Todd M. Friedman, P.C.
Attorney for Plaintiff

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SONOMA CIVIL DIVISION 600 ADMINISTRATION DRIVE, ROOM 107-J SANTA ROSA, CALIFORNIA 95403-2878 (707) 521-6500 www.sonoma.courts.ca.gov SIEGEL vs GC SERVICES LIMITED PARTNERSHIP	(FOR COURT USE ONLY) <div style="text-align: center;"> ENDORSED FILED APR 11 2017 </div> <div style="text-align: center;"> <small>SUPERIOR COURT OF CALIFORNIA COUNTY OF SONOMA</small> </div>
NOTICE OF ASSIGNMENT TO ONE JUDGE FOR ALL PURPOSES, NOTICE OF CASE MANAGEMENT CONFERENCE, and ORDER TO SHOW CAUSE	Case number: MCV-240960

**A COPY OF THIS NOTICE MUST BE SERVED WITH THE SUMMONS AND COMPLAINT
AND WITH ANY CROSS-COMPLAINT**

1. THIS ACTION IS ASSIGNED TO HON. Allan D Harcastle FOR ALL PURPOSES.

Pursuant to California Rules of Court, Rule 2.111(7), the assigned judge's name must appear below the number of the case and the nature of the paper on the first page of each paper presented for filing.

2. EACH DEFENDANT MUST FILE A WRITTEN RESPONSE TO THE COMPLAINT AS REQUIRED BY THE SUMMONS.

A Case Management Conference has been set at the time and place indicated below:

Date: 08/10/2017	Time: 3:00 PM	Courtroom 19
Location: Courtroom 19		
Civil and Family Law Courthouse		
3055 Cleveland Ave		
1st Floor		
Santa Rosa, CA 95403		

3. No later than 15 calendar days before the date set for the case management conference or review, each party must file a case management statement [Judicial Council form #CM-110] and serve it on all other parties in the case. In lieu of each party's filing a separate case management statement, any two or more parties may file a joint statement.

4. At the conference, counsel for each party and each self-represented party must appear personally or by telephone [California Rules of Court, Rule 3.670(c)(2)]; must be familiar with the case; and must be prepared to discuss and commit to the party's position on the issues listed in California Rules of Court, Rule 3.727.

5. Pre-approved dispositions are recorded three (3) court days prior to the case management conference. These may be obtained by calling (707) 521-6883 or by going to <http://sonoma.courts.ca.gov/online-services/tentative-rulings>.

ORDER TO SHOW CAUSE

To Plaintiff(s), Cross-complainants, and/or their attorneys of record:

If, on the date shown above, you are not in compliance with the requirements stated in the California Rules of Court, rules 2.30, 3.110, and/or 3.720 through 3.771 inclusive, you must then and there show cause why this court should not impose monetary and/or terminating sanctions in this matter.

Pursuant to California Rule of Court, rule 3.221(b), information and forms related to Alternative Dispute Resolution are available on the Court's website at <http://sonoma.courts.ca.gov/self-help/adr>.

ELECTRONIC SERVICE OF DOCUMENTS**Enabled by Local Rule 18.16**

Voluntary e-service is available in Sonoma County. The Court has pre-approved a Stipulation for cases in which the attorneys or parties choose e-service. A copy of the Stipulation is available under the "Civil" section in the "Division" tab of the Court website: <http://www.sonoma.courts.ca.gov>. The advantages of e-service to the parties include:

SAVE MONEY	Reduction in costs related to photocopying, retrieving, storing, messenger and postage fees. No special software is needed to use e-service
SAVE TIME	Instant service of your documents on all parties
SAVE SPACE	With 24/7 internet access to all documents, you do not need to house paper copies
GAIN CERTAINTY	Immediate confirmation of service for your records. Documents are not delayed in the mail or blocked by email spam blockers and firewalls

To take advantage of e-service, select an e-service provider and file the signed Stipulation with the Court. Parties can then e-serve documents through the selected provider. Information about e-service providers is available at the website for the Sonoma County Bar Association: <http://www.sonomacountybar.org>. The Court does not endorse one provider over another.

To learn more about available e-service providers and their fees, please visit their website

Note: Hard-copy pleadings are required to be filed with the Court in accordance with applicable provisions of the Code of Civil Procedure, California Rules of Court and local rules. You do not need to provide a courtesy copy of a served document to the specific department in which the matter has been assigned.

DISCOVERY FACILITATOR PROGRAM

Effective January 1, 2008, the Sonoma County Superior Court promulgated Sonoma County Local Rule 4.14 which established the Discovery Facilitator Program. Participation in the Discovery Facilitator Program shall be deemed to satisfy a party's obligation to meet and confer under Sonoma County Local Rule 5.5 and applicable provisions of the Code of Civil Procedure and California Rules of Court. This program has been providing assistance in resolving discovery disputes and reducing the backlog of matters on the law and motion calendars in our civil law departments. The Sonoma County Superior Court encourages all attorneys and parties to utilize the Discovery Facilitator Program in order to help resolve or reduce the issues in dispute whether or not a discovery motion is filed.

There is a link to Local Rule 4.14 and the list of discovery facilitator volunteers on the official website of the Sonoma County Superior Court at <http://www.sonoma.courts.ca.gov>. On the home page, under the "AVAILABLE PROGRAMS & HELP" section, click on »[Discovery Facilitator Program](#). You can then click on either "Local Rule 4.14" to obtain the language of the local rule, or "List of Facilitators" for a list of the volunteer discovery facilitators and accompanying contact and biographical information.